

HONORABLE JAMAL N. WHITEHEAD

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

SEATTLE SCHOOL DISTRICT NO. 1,

Plaintiff / Counterclaim  
Defendant,

v.

KURT BENSHOOF,

Defendant / Counterclaim  
Plaintiff,

A.R.W. By and Through His Father, KURT  
BENSHOOF,

Counterclaim Plaintiff,

v.

NATHAN L. CLIBER,  
SARAH E. SPIERLING MACK,  
GREGORY C. NARVER,  
JESSICA R. OWEN,  
BLAIR M. RUSS,

Counterclaim Defendants.

NO. 2:23-cv-01829-JNW

**COUNTERCLAIM DEFENDANT  
NATHAN CLIBER'S JOINDER OF  
COUNTERCLAIM DEFENDANTS  
MACK AND NARVER'S RESPONSE TO  
COUNTERCLAIM PLAINTIFFS'  
MOTION FOR DISTRICT COURT TO  
ENTERTAIN THEIR MOTION TO  
VACATE**

NOTE ON MOTION CALENDAR:

February 27, 2025



1 Comes now Counterclaim Defendant Nathan Cliber (“Counterclaim Defendant Cliber”)  
2 and files this Joinder of Counterclaim Defendants Mack and Narver’s Response to Counterclaim  
3 Plaintiffs’ Motion for District Court to Entertain Their Motion to Vacate (the “Response”), Dkt.  
4 80, and states in support thereof as follows:

5 Counterclaim Defendant Cliber joins in Counterclaim Defendants Mack and Narver’s  
6 Response and incorporates the same as if fully stated herein. For the reasons stated in  
7 Defendants Mack and Narver’s Response, Counterclaim Defendant Cliber respectfully requests  
8 that this Court deny Counterclaim Plaintiffs’ Motion for District Court to Entertain Their Motion  
9 to Vacate (Dkt. 79).

10 The undersigned certifies that this memorandum contains 97 words, in compliance with  
11 the Local Civil Rules.

12 Dated: February 20, 2025

GORDON REES SCULLY MANSUKHANI,  
LLP

13 By: /s/ Sarah N. Turner  
14 Sarah N. Turner, WSBA No. 37748

15 By: /s/ Michael C. Tracy  
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*Attorneys for Defendant Nathan Cliber*



**CERTIFICATE OF SERVICE**

The undersigned declares under penalty of perjury under the laws of the State of Washington that on this day a true and accurate copy of the foregoing document was filed with the above-entitled Court through the United States District Court CM / ECF System and served as indicated:

Plaintiff / Counterclaim Defendant  
Seattle School District No. 1\

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Defendant / Counterclaim Plaintiff

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Date: February 20, 2025

*Jacqueline Burrell*  
Jacqueline Burrell, Legal Assistant